

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

21-08257 BKOBJ01
BROCK & SCOTT, PLLC
302 Fellowship Rd, Suite 130
Mount Laurel, NJ 08054
(844) 856-6646
Attorneys for Freedom Mortgage Corporation

In Re:

ROBINSON ROSARIO

Case No: 19-26982-VFP

Hearing Date: December 2, 2021

Judge: VINCENT F. PAPALIA

Chapter: 13

**CERTIFICATION IN RESPONSE TO TRUSTEE'S OBJECTION TO
MOTION TO APPROVE LOAN MODIFICATION**

I, Elizabeth Stull, hereby certify as follows:

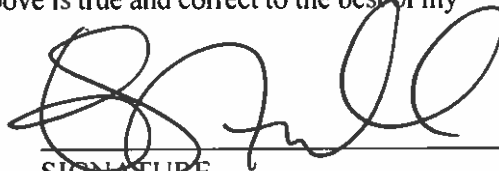
1. I am a Manager for Freedom Mortgage Corporation, a Secured Creditor of the Debtor and Movant in this action.
2. As stated in the Motion to Approve Loan Modification, the Debtor was approved for a Partial Claim Note and Subordinate Mortgage.
3. The Chapter 13 Standing Trustee filed an Objection to the Motion to Approve Loan Modification on November 3, 2021.
4. The application of the Partial Claim Note funds secured by the Subordinate Mortgage will resolve all pre-petition arrears described in Freedom Mortgage Corporation's Proof of Claim filed on November 8, 2019.
5. The application of the Partial Claim Note funds secured by the Subordinate Mortgage will also resolve any and all post-petition arrears and the account will be due for the December 1, 2021 payment.

6. Any fees remaining on the account after the application of the Partial Claim Note funds will be waived.

7. Upon the Court's approval of the Partial Claim Note and Subordinate Mortgage, Freedom Mortgage Corporation will amend its Proof of Claim accordingly.

8. I certify under penalty of perjury that the above is true and correct to the best of my knowledge.

Dated: 11/29/21


SIGNATURE
FREEDOM MORTGAGE
CORPORATION

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**CERTIFICATION OF PARTICIPANT
REGARDING MOTION TO APPROVE LOAN MODIFICATION**

I HEREBY CERTIFY that with respect to the copy of the captioned Response to Trustee's Objection to Motion to Approve Loan Modification submitted to the Court, the following conditions have been met:

- (a) The Affiant has acknowledged the genuineness of the original signature;
- (b) The original document was executed in completed form prior to facsimile transmission;
- (c) The document or a copy with an original signature affixed to it will be obtained by the Participant within seven business days after the date the document or pleading with the facsimile signature was electronically filed with the Court; and
- (d) In accordance with the Court's Administrative Procedures for Filing, Signing, and Verifying Documents by Electronic Means (collectively, the "Administrative Procedures"), at paragraph II C.2, the document containing the original signature will be maintained in paper form by the Participant for a period not less than seven years from the date of closure of the case or proceeding in which the document is filed; and that upon required the original document must be provided to other parties or the Court for review.

/s/ Matthew Fissel

Matthew Fissel

(Bar No. 038152012)

Attorney for Movant

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CERTIFICATION OF SERVICE

1. I, Cassondra Emanuel:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for BROCK & SCOTT, PLLC, who represents Freedom Mortgage Corporation in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On November 30, 2021, I sent a copy of the following pleadings and/or documents to the parties listed below:

Response to Trustee's Objection to Motion to Approve Loan Modification

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: November 30, 2021

/s/ Cassondra Emanuel
Cassondra Emanuel

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
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<p>ROBINSON ROSARIO 179 CAMBRIDGE AVE APT GARFIELD, NJ 07026-3341</p>	<p>Debtor</p>	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>
<p>ROMAN AKOPIAN 69 MERKEL DR BLOOMFIELD, NJ 07003</p>	<p>Debtor's Attorney</p>	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>
<p>Marie-Ann Greenberg 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004</p>	<p>Trustee</p>	<p><input type="checkbox"/> Hand-delivered</p> <p><input type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>
<p>U.S. Trustee Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102</p>	<p>Trustee</p>	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.